

# EXHIBIT “B”

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October 11, 2007

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**Via Facsimile to (706) 694-3173  
and U. S Mail**

Re: David R. Wilson & Charlene Wilson v. TASER International, Inc.; United States  
District Court for the Northern District of Georgia, Rome Division; Civil Action  
No. 4:06-CV-179-HLM

Dear Cindy:

I am in receipt of your letter of October 10, and I agree that we should be able to work out this dispute.

It is extremely perplexing that Ms. Schreiner is so resistant to having this deposition in Phoenix, especially since she has agreed to be deposed in Phoenix in another case where TASER is a defendant (*Williams v. TASER, et al.*). At not point during the scheduling process for the deposition in *Williams* was it even suggested to me that Ms. Schreiner wanted the *Williams* deposition to be taken anywhere but Phoenix. In your letter, you state that Ms. Schreiner refuses to be deposed in Phoenix for the *Wilson* case because "she has been threatened and harassed by members of the law enforcement community in the Phoenix area who are on TASER's payroll." If this really was a legitimate concern, Ms. Schreiner would feel just as uncomfortable about having the *Williams* deposition in Phoenix, yet she has made no effort to relocate the *Williams* deposition to Georgia. That being the case, how can it be reasonable to relocate this one?

Based on your letter, it is clear that a deposition in Phoenix would be much less disruptive to Ms. Schreiner's work responsibilities, as it will minimize the time she must be away from either of her two jobs. Likewise, while Mr. Brave has an office in Wisconsin, he spends much of his time in Phoenix, and therefore it is exponentially more convenient for him to do the deposition in Phoenix than in Rome, Georgia.

We will agree to depose Ms. Schreiner in November in order to accommodate her work responsibilities. In light of the delays caused by this dispute, it is apparent that it will be extremely difficult, if not impossible, for us to complete this deposition and Mr. Wilmer's deposition within the 30-day period set by the Court. While we currently intend to depose Mr. Wilmer, that decision will be largely determined by Ms. Schreiner's testimony. Therefore, we do not plan on deposing both Ms. Schreiner and Mr. Wilmer on the same day. Please let me

know if you will agree to a joint motion requesting another 30 days to complete these depositions.

Thank you for providing me with the dates you are available for these depositions, and I will confirm Mr. Brave's availability for these dates and get back to you. The deposition that Ms. Schreiner agreed to give in the *Williams* case on October 18 is being conducted at the offices of Coash & Coash, Court Reporters, 1802 N. 7th Street, Phoenix, AZ 85006, and it seems reasonable that we have these depositions there as well.

Lastly, I take issue with your mischaracterization of our previous conversation. At no point did I tell you that TASER "intended to have Ms. Schreiner arrested" following her deposition, and I do not appreciate your suggestion that I somehow threatened this witness. You know that is not true. You asked for a "commitment" from TASER "that Ms. Schreiner will not be arrested and prosecuted for giving her deposition." Of course, TASER doesn't have the power to arrest or prosecute Ms. Schreiner, nor the power to grant her immunity, since any criminal charges would be up to the appropriate authorities (no matter where the deposition takes place). This certainly does not provide a reason to move this deposition.

I look forward to resolving this issue as soon as possible.

Yours very truly,

WOMBLE CARLYLE SANDRIDGE & RICE, PLLC

  
Jessie C. Fontenot, Jr.

JCF/ara